

128 WEST DEL RIO DRIVE
TEMPE, ARIZONA 85282-3615
MAY 26, 1993

92-235

COMMITTEE HANDLING NPRM 92-235,
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET N. W.
WASHINGTON, D. C. 20554

RECEIVED

MAY 27 1993

FREQUENCY COMMITTEE
ACADEMY OF MODEL AERONAUTICS
1810 SAMUEL MORSE DRIVE
RESTON, VIRGINIA 22090

RE: NPRM 92-235 PLEASE ROUTE THIS LETTER IMMEDIATELY TO CORRECT PERSONS.

FCC MAIL BRANCH

DOCKET FILE COPY ORIGINAL

LADIES AND GENTLEMEN:

AS A LONG TIME MODELER (54 YEARS) AND A LONG TIME RADIO CONTROL FLYER (37 YEARS), I HAVE FOLLOWED THE AVAILABILITY OF AND USE OF FREQUENCIES FOR THE CONTROL OF MODEL AIRPLANES BY RADIO. NOW, DUE TO THE CRUNCH OF DEMAND FOR ALL AVAILABLE FREQUENCIES BY THE MONIED INTERESTS, (BUILDERS OF ALL THE PERSONAL COMMUNICATIONS SYSTEMS), THE NPRM 92-235 IS BEING PROMULGATED IN THEIR INTEREST WITH LITTLE REGARD TO WHAT IT WILL DO TO THE THOUSANDS OF RADIO CONTROL MODELERS WHO PERSONALLY OWN MILLIONS OF DOLLARS OF RADIO CONTROL EQUIPMENT AND BILLIONS OF DOLLARS WORTH OF AIRPLANES. OBVIOUSLY, THOSE WHO FEEL THAT THE NEW FREQUENCIES CAN BE SANDWICHED IN BETWEEN THE EXISTING 72 MHz FREQUENCIES THAT ARE USED BY MODELERS AND OTHERS CAN DO SO WITHOUT INTERFERENCE, BUT THEY OBVIOUSLY HAVE NEVER BEEN FLYING A VALUABLE PLANE AND BEEN "HIT" WITH INTERFERENCE FROM ANOTHER SOURCE, TO SEE THEIR PRIDE AND JOY GO OUT OF CONTROL AND CRASH HIGH SPEED INTO THE GROUND INTO A TRILLION PIECES.

IN THE FCC RESPONSE THAT I RECEIVED HERE AFTER THE FIRST LETTER WRITING TO MY TWO SENATORS, REPRESENTATIVE AND TO THE FCC, IT BECAME QUITE APPARENT THAT THE FCC AND OTHERS WERE GOING TO SHOVE THE NPRM 92-235 DOWN THE THROATS OF ALL THE USERS, WITHOUT REGARD TO THE FINANCIAL LOSS THAT WILL BE TAKEN BY THE RADIO CONTROL OWNERS WHO SINCE 1991 HAVE BOUGHT ALL NEW NARROW BANDED TRANSMITTERS AND DUAL CONVERSION RECEIVERS TO COMPLY WITH THE NEW FCC REGULATIONS. NOW IT APPEARS THAT THE FCC WISHES TO TIGHTEN THE NOOSE EVEN TIGHTER AND REQUIRE EVEN BETTER RADIO CONTROL TRANSMITTERS AND RECEIVERS SO THAT THE NEW "ADDED" FREQUENCIES WILL NOT INTERFER AND "SHOOT DOWN" OUR MODEL PLANES. WITH THIS IN MIND, I WRITE TO BOTH OF YOU TO SHARE MY IDEAS SO THAT MODEL PLANE FLYING IS NOT TOTALLY TAKEN AWAY BY THE "FREQUENCY GRAB" PARTIES, AND SO THAT THOSE PARTIES WHO ARE ALLOCATED THE "ADDITIONAL" FREQUENCIES ARE KEPT SAFE FROM POSSIBLE INTERFERENCE FROM MODEL FLYING SITES THROUGHOUT THE COUNTRY. PLEASE CONSIDER THE FOLLOWING AND USE THESE IDEAS TO HELP ALL THE CONCERNED PARTIES INVOLVED.

1. REQUIRE THAT ALL NEW TRANSMITTERS IN THE 72 MHz BAND THAT ARE ON "ADDED" FREQUENCIES BE REQUIRED TO HAVE NO GREATER POWER THAN MODEL TRANSMITTERS, AND THAT ALL NEW TRANSMITTERS WILL BE REQUIRED TO HAVE NARROW BANDING AS DO THE MODEL TRANSMITTERS. THE NEW TRANSMITTERS WILL HAVE TO MEET BANDING REGULATIONS WITH A COMPLIANCE STICKER AS WE DO CURRENTLY. IF

HOBBY OF RADIO CONTROLLED MODELS, AND THE RICH WILL CONTROL ALL THE AIRWAYS. WE HERE IN THE UNITED STATES OF AMERICA DO HAVE A LARGE NATIONAL DEBT, BUT SELLING FREQUENCIES IS NOT THE WAY TO SOLVE THAT PROBLEM. SURELY YOU CAN SEE THAT PRIVATELY "OWNED" FREQUENCIES WOULD LEAD TO TOTAL MAYHEM, INTERFERENCE AND UNHAPPINESS AMONG THE CITIZENS OF OUR GREAT COUNTRY. PLEASE DROP THAT IDEA BEFORE IT GOES ANY FURTHER! REMEMBER, THOSE OF US WHO CURRENTLY USE THE AIRWAVES FOR OUR HOBBY ARE CITIZENS, TAXPAYERS, AND VOTERS.

3. IMMEDIATELY, TAKE THE RADIO CONTROL MODELER GROUP OUT OF BEING SECONDARY STATUS USERS AND RESTORE US TO STATUS AS FIRST CLASS CITIZENS!!! AS STATED, ALTHOUGH WE ARE SMALL IN FINANCIAL BACKING, WE ARE LARGE IN NUMBER IN THAT R/C MODELING IS PERHAPS THE FASTEST GROWING HOBBY IN THE WORLD. IF SPECIFIC LICENSING IS REQUIRED FOR RADIO CONTROL MODELING, SO BE IT SO LONG AS WE ARE NOT ASSOCIATED WITH THE "AIR HEADS" WHO BABBLE, SWEAR, AND JUST "MOTOR MOUTH" ALONG ON THE "CB" CHANNELS WITH THE AMERICAN TRUCKERS.

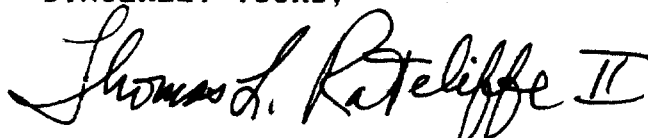
4. ESTABLISH THE 72 mHz BAND SPECIFICALLY FOR USE WITH ALL, YES,... REPEAT, ALL TRANSMITTERS BEING LIMITED TO THE LOW POWER OUTPUT THAT WE NOW SHARE WITH ALL OTHER R/C TRANSMITTERS. IF THE CURRENT "PRIMARY STATUS" USERS ON THE 72 mHz BAND ARE REQUIRED TO CHANGE TO LOWER POWER OUTPUT STATUS AND ALL THE "NEW" FREQUENCY USERS (CRANE OPERATORS, ETC.) ALSO COMPLY WITH THIS AS STATED IN "1." ABOVE, THEN PERHAPS NO EXTRAORDINARILY EXPENSIVE NEW RECEIVERS WILL HAVE TO BE MANUFACTURED FOR US. (ESPECIALLY NOTE THAT CRANE OPERATORS AND OTHER SURFACE USERS SHOULD BE TUCKED INTO THE 75 mHz BAND WHICH ALSO SHOULD BE ESTABLISHED AS A LOW POWER BAND BUT FOR DIFFERENT USES.) FOR OUR RADIO CONTROLLED MODELS, PLEASE BE MINDFULL, THAT A FOUR POUND AIRPLANE CARRIES A RECEIVER 3/4" BY 1 1/4" BY 2 1/4" THAT WEIGHS TWO OR THREE OUNCES AND THAT IF NEW RECEIVERS THAT WEIGHT TWO OR THREE POUNDS HAVE TO BE USED TO BE SIGNIFICANTLY DISCRIMINATORY TO HANDLE THE NEW FREQUENCY SPACING AS SUGGESTED, THAT ALONE WILL STOP MOST RADIO CONTROLLED AEROMODELING.

5. PLEASE DO NOT FORCE THESE CHANGES ON THE USERS UNTIL AFTER 1998! IF NEW EQUIPMENT IS NEEDED TO BE COMPATIBLE WITH THE "PRIMARY USERS" AND THE NEW FREQUENCY USERS, THEN PLEASE ALLOW ENOUGH LEAD TIME FOR THE RADIO CONTROL MANUFACTURERS ASSOCIATION (R/CMA) COMPANIES TO BE ABLE TO ENGINEER, PRODUCE AND MARKET NEW EQUIPMENT TO THE MODEL FLYING PUBLIC.

WITH THESE THOUGHTS IN MIND, WE THE MODELERS ASK YOU THE FCC PERSONNEL TO BE FAIR TO ALL OF THE CURRENT USERS OF THE 72 AND 75 mHz FREQUENCY BANDS AND TO NOT RUN ROUGHSHOD OVER THESE PEOPLE. PLEASE WORK OUT SOLUTIONS TO THE PROPER USE OF FREQUENCIES AND PLEASE DON'T LOOSE SIGHT OF THE FACT THAT THE RADIO CONTROL MODELERS ARE A GROWING GROUP.

THANK YOU FOR CONSIDERING THESE IDEAS ALONG WITH OTHERS THAT ARE PRESENTED TO YOU.

SINCERELY YOURS,



THOMAS L. "TOM" RATCLIFFE II
AMA MEMBER 22000